

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>  
Debtors.

Chapter 11

Case No. 22-11068 (KBO)

(Jointly Administered)

Related D.I. No. 30433, 30899

**Hearing Date: August 12, 2025 at 9:30 am (ET)**

**Objection Deadline: August 5, 2025 at 4:00 pm (ET)**

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**AMENDED MOTION TO APPEAR REMOTELY VIA VIDEO CONFERENCE**

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Gellert Seitz Busenkell & Brown LLC (“GSBB”) and Morgan & Morgan, P.A. (“M&M” and collectively with GSBB, “Counsel”), counsel to those individuals identified on Exhibit A (collectively, the “M&M FTX Customers” or “M&M Group of FTX Clients”) <sup>2</sup> annexed hereto, hereby files this motion requesting permission for Counsel at Morgan & Morgan PA to appear via video conference for the hearing scheduled for August 12, 2025, and all future hearings, so long as local Counsel is present at said hearings in person, and respectfully states as follows:

1. Each M&M FTX Customer has individually retained Morgan & Morgan to represent him or her as counsel in connection with claims asserted in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), and/or in connection with that certain adversary proceeding

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063, respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>.

<sup>2</sup> Counsel does not represent the M&M FTX Customers as a “committee” or a “group” (as such terms are used in the Bankruptcy Code and the Bankruptcy Rules). Rather, Counsel has combined its clients into a group for purposes of addressing the instant motion.

pending in the Chapter 11 Cases, captioned *In re: FTX Trading Ltd., et al.*, Adv. Pro. No. 25-50962-KBO (the “M&M Adversary Proceeding”).

2. For purposes of the Chapter 11 Cases and the M&M Adversary Proceeding, Counsel represents each M&M FTX Customer in their individual capacity.

3. A Declaration of Benjamin Webster, confirming the engagement of said clients by Counsel, is attached hereto, and incorporated by reference herein, as **Exhibit B**<sup>3</sup>.

4. Counsel at M&M, Attorney Amir Isaiah, who resides in Florida, cannot travel to Wilmington, Delaware to attend the in-person hearing on August 12, 2025, due to scheduling conflicts that same day, without having to disrupt his schedule, accordingly.

5. Attorney Isaiah has attended omnibus hearings remotely before vis-à-vis the above referenced matter, and is accessible via video conference on August 12, 2025, at 9:30 am (ET).

6. Local Counsel, GSBB, will also be attending the August 12, 2025 hearing (and ALL future hearings), on behalf of the M&M FTX Customers, as Counsel, in-person.

7. Considering the total number of M&M FTX Customers (well over 300), Attorney Isaiah will be forced to appear in-person on behalf of said clients quite frequently, if the requested relief is not afforded.

WHEREFORE, Movant respectfully requests that Counsel, Amir Isaiah, be permitted to appear via video conference at the August 12, 2025 hearing, and future hearings, so long as local Counsel appears at said hearing(s) in-person, as Counsel.

*[Remainder of page intentionally left blank]*

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<sup>3</sup> Counsel has similarly filed a verified Rule 2019 Statement listing the identities of all clients in relation to the above referenced matter.

Dated: July 29, 2025

GELLERT SEITZ BUSENKELL & BROWN, LLC

/s/ Margaret M. Manning

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By: /s/ Amir Isaiah

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*Counsel to the M&M FTX Customers*